

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

John W. Weiss
Leah M. Eisenberg
David E. Sklar
PASHMAN STEIN WALDER HAYDEN, P.C.
21 Main Street, Suite 200
Hackensack, New Jersey 07601
Telephone: (201) 270-5477
Email: jweiss@pashmanstein.com
leisenberg@pashmanstein.com
dsklar@pashmanstein.com

-and-

Joaquin M. C de Baca (admitted *pro hac vice*)
Richard A. Stieglitz (admitted *pro hac vice*)
Youmi Kim (admitted *pro hac vice*)
MAYER BROWN LLP
1221 Avenue of the Americas
New York, New York 10020-1001
Telephone: (212) 506-2500
Email: jcdebaca@mayerbrown.com
rstieglitz@mayerbrown.com
ykim@mayerbrown.com

Counsel for (1) Leeward Renewable Energy, LLC, on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC, (2) Longroad Development Company, LLC, on behalf of Serrano Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC, and (3) DTE Electric Company

In Re:

POWIN, LLC, *et al.*,¹

Debtors.

Chapter 11

Case Number: 25-16137 (MBK)

Jointly Administered

**Hearing Date: July 15, 2025 at 11:30 A.M.
(ET)**

Objection Deadline: July 8, 2025

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583], (ii) Powin, LLC [0504], (iii) PEOS Holdings, LLC [5476], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], and (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

**NOTICE OF HEARING ON EMERGENCY MOTION OF LICENSEES
FOR ENTRY OF AN ORDER (I) COMPELLING THE DEBTORS TO COMPLY WITH
SECTION 365(N)(4) OF THE BANKRUPTCY CODE, (II) GRANTING ADEQUATE
PROTECTION UNDER SECTION 363(E) OF THE BANKRUPTCY CODE,
AND (III) GRANTING OTHER APPROPRIATE RELIEF**

PLEASE TAKE NOTICE, that Leeward Renewable Energy, LLC on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC (collectively, the “Leeward Licensees”), Longroad Development Company, LLC,² on behalf of Serrano Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC (collectively, the “Longroad Licensees”), and DTE Electric Company (DTE and together with the Leeward Licensees and the Longroad Licensees, the “Licensees”), by and through its undersigned counsel, filed the *Emergency Motion of Licensees for Entry of an Order (I) Compelling the Debtors to comply with Section 365(n)(4) of the Bankruptcy Code, (II) Granting Adequate Protection under Section 363(e) of the Bankruptcy Code, and (III) Granting Other Appropriate Relief* (the “Motion to Compel”) [Docket No. 117].

PLEASE TAKE FURTHER NOTICE that concurrently with the filing of the Motion to Compel, the Licensees filed an *Application for Order Shortening Time for Notice of (A) the Emergency Motion of Licensees for Entry of an Order (I) Compelling the Debtors to Comply with Section 365(n)(4) of the Bankruptcy Code, (II) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code, and (III) Granting Other Appropriate Relief and (B) Motion for Entry of an Order Authorizing Licensees to Redact and File Under Seal Confidential Information*

² Please note that the correct name of this entity is “Longroad Development Company, LLC.” All prior references to “Longroad Energy Holdings, LLC” or “Longroad Energy Partners” in earlier filings in these Chapter 11 Cases shall be deemed to refer to “Longroad Development Company, LLC.”

Contained in the Energy Supply Agreements and Long Term Services Agreements in Connection with the Licensees Motion to Compel (the “Application for Shortened Time”) [Docket No. 119].

PLEASE TAKE FURTHER NOTICE that the Debtors and the Licensees conferred following the filing of the Application for Shortened Time and the hearing before the Court held on June 24, 2025, wherein the Debtors and the Licensees agreed to have the Motion to Compel heard on July 15, 2025 under a normal briefing schedule pursuant to D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion to Compel must be made in writing, and must be filed with this Court and served upon Pashman Stein Walder Hayden, P.C., 21 Main Street, Suite 200 Hackensack, New Jersey 07601, John W. Weiss (jweiss@pashmanstein.com), Leah M. Eisenberg (leisenberg@pashmanstein.com) and David E. Sklar (dsklar@pashmanstein.com), Mayer Brown LLP, 1221 Avenue of the Americas, New York, New York 10020, Joaquin M. C de Baca (jcdebaca@mayerbrown.com), Richard A. Stieglitz (rstieglitz@mayerbrown.com) and Youmi Kim (ykim@mayerbrown.com) no later than July 8, 2025.

PLEASE TAKE FURTHER NOTICE that the Debtors and the Licensees further agreed that any reply to any objection or response to the Motion to Compel must be filed by the Licensees no later than July 11, 2025.

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion to Compel is scheduled to be held before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of New Jersey, via Zoom,

on July 15, 2025 at 11:30 A.M. (ET). Parties who wish to attend via Zoom must request panelist status by emailing Chambers at chambers_of_mbk@njb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that, in the event that timely objection is not filed with the Court and served upon the undersigned counsel by the Objection Deadline, and as provided in the District of New Jersey Local Bankruptcy Rules 9013-1(a) and (f), the Motion to Compel shall be deemed uncontested and the Court may, in its discretion, grant the requested relief.

Dated: June 27, 2025

Respectfully submitted,

/s/ Leah M. Eisenberg

John W. Weiss

Leah M. Eisenberg

David E. Sklar

PASHMAN STEIN WALDER HAYDEN, P.C.

21 Main Street, Suite 200

Hackensack, New Jersey 07601

Telephone: (201) 270-5477

Email: jweiss@pashmanstein.com

leisenberg@pashmanstein.com

dsklar@pashmanstein.com

-and-

Joaquin C de Baca (admitted *pro hac vice*)

Richard A. Stieglitz (admitted *pro hac vice*)

Youmi Kim (admitted *pro hac vice*)

MAYER BROWN LLP

1221 Avenue of the Americas

New York, New York 10020

Telephone: (212) 506-2500

Facsimile: (212) 262-1910

Email: JCdeBaca@mayerbrown.com

RStieglitz@mayerbrown.com

YKim@mayerbrown.com

Counsel for (1) Leeward Renewable Energy, LLC, on behalf of Rabbitbrush Solar, LLC, Chaparral Springs,

LLC, and Antelope Valley BESS, LLC, (2) Longroad Development Company, LLC, on behalf of Serrano Solar; LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC, and (3) DTE Electric Company